

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA**

BRANDY SUCKLEY, REANNAN  
SUCKLEY, BLAKE ISH, JYL  
ALBERTSON, MATHEW BAUMSTARK,  
DANIKA OWAN, DOC RITCHIE,  
LYNETTE COLE-PEREA, MANUEL  
PEREA, EMILY HOLLY, BRYAN  
FLEMING,

Plaintiffs,

v.

THE CITY OF WILLISTON, NORTH  
DAKOTA,

Defendant.

Case No. 21-cv-00012-CRH

**JOINT MOTION TO EXTEND  
DISCOVERY DEADLINES**

Plaintiffs Brandy Suckley, Reannan Suckley, Blake Ish, Jyl Albertson, Mathew Baumstark, Danika Owan, Doc Ritchie, Lynette Cole-Perea, Manuel Perea, Emily Holly, and Brian Fleming (collectively “Plaintiffs”) and Defendant The City of Williston, North Dakota (the “City”) (collectively the “Parties”) and respectfully request this Court to extend the fact discovery and expert witness deposition deadlines to April 15, 2022. In support, the Parties state:

1. On May 6, 2021, the Court entered its Scheduling/Discovery Plan (ECF No. 42).
2. The Scheduling/Discovery Plan set the deadline for all fact discovery, including fact witness depositions for March 1, 2022.
3. The Scheduling/Discovery Plan set the deadline for completion of all expert witness depositions for April 4, 2022.
4. Although the Parties have been diligently and cooperatively conducting discovery in this litigation, the Parties require additional time to complete discovery and request that the

deadline for all fact discovery, including fact witness depositions, and expert witness depositions be extended to April 15, 2022.

5. Extending these deadlines will not prejudice any party nor affect the existing dispositive motion deadline or trial setting.

WHEREFORE, the Parties respectfully request the Court extend the fact discovery and the expert witness deposition deadlines to April 15, 2022.

Dated this 7th day of February 2022.

BRANDY SUCKLEY, REANNAN  
SUCKLEY, BLAKE ISH, JYL  
ALBERTSON, MATHEW BAUMSTARK,  
DANIKA OWAN, DOC RITCHIE,  
LYNETTE COLE-PEREA, MANUEL  
PEREA, EMILY HOLLY, BRYAN  
FLEMING, Plaintiffs,

/s/ V. Gene Summerlin

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THE CITY OF WILLISTON, NORTH  
DAKOTA, Defendant,

/s/ Brian D. Schmidt

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*Attorneys for Defendant, The City of Williston,  
North Dakota*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of February 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/V. Gene Summerlin